REMARKS

In the Office Action of May 14, 2008, claims 49 and 52-59 were rejected. The claims, as amended, are listed above. No claims have been cancelled. No claims have been added. Accordingly, claims 49, 52-59 are now pending for examination.

Applicant respectfully requests reconsideration of the pending claims and respond to the Office Action as follows:

Claim Rejections - 35 USC § 103

Claims 49, 52-59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Draaijer et al. (U.S. 5,987,463)("Draaijer") in view of Shah et al. (U.S. 6,662,174 B2)("Shah").

Applicant respectfully traverses the rejections.

Present Invention

Independent claim 49, as amended, is directed towards a method for processing a query. The method includes receiving from a first computer system a request to process a query at a second computer system, the request to process the query comprising data and metadata and a request to perform an operation on the data and metadata at the second computer system.

The method also includes processing the query, at the second computer system, including performing the operation on the data and the metadata to generate a result for the query. The data and the metadata are not stored on the second computer system prior to the second computer system receiving the

request to process the query. After processing, the second computer system returns the result of the query to the first computer system.

Prior Art

Draaijer generally discloses accessing foreign processes in a heterogeneous database environment (Abstract). Specifically, Draaijer discloses a client 200 connected via line 310 to a local server process 202 (FIG. 2A). Draaijer explicitly states that metadata definitions for heterogeneous services are stored in the data dictionary 220, in the local process server 202 (8:20-22; also see FIG. 2A). The local process sever 202 includes a SQL services module 210b to parse SQL statements (9:26-32). Examiner acknowledges that Draaijer fails to disclose metadata utilized to process the query that is not stored on a second computer system prior to the second computer system receiving the request to process the query (Advisory Action of 8/13/87). Thus, Draaijer stores metadata on a server.

Shah generally discloses a method for determining database queries to be sent by an analytical server to a database (see Abstract). Particularly, Shah discloses a client 135, an analytical sever engine 120, and a metadata structures 145. The analytical server engine 120 accesses the metadata structures 145 responsive to a metric request from client 135.

Arguments

A. *Draaijer and/ or Shah Do Not Teach of Suggest "Receiving From a First Computer System a Request to Process a Query at a Second Computer System, the Request to Process the Query Comprising Data and Metadata and a Request to Perform an Operation on the Data and Metadata at the Second Computer System"*

In the Office Action, Examiner relied upon Draaijer to show a request including both data and metadata. During the interview, Examiner acknowledged that Draaijer fails to disclose a query that includes both data and metadata. In

fact, Draaijer explicitly states that "a data dictionary 220 providing metadata definitions…is stored in the local database 306" (8:18-20) which is on the server side, not the client side. FIG. 1 also illustrates that the data dictionary 220 is on the server-side of network 2, not on the client-side such as home Internet PC 3. Thus, the data dictionary of Draaijer fails to disclose the query of claim 49.

Examiner now relies upon Shah to show the request. Examiner states in the Interview Summary that "[t]he metric query must include the metadata because based on the metric query somehow the data and tables are measuring in response to the metric query." Applicant disagrees because Shah has the same conventional client/ server set up as Draaijer.

First, the system architecture disclosed by Shah in FIG. 1 contradicts such an assertion. In FIG. 1, client 135 is in communication with analytic server 120. In turn, analytic server 120 is in communication with metadata structures 145 ("analytical server engine 120...uses metadata structures 145 to identify the necessary fact components" Shah 2:41-44). Moreover, Shah is silent with respect to client 135 having any direct interaction with metadata structures 145. As a result, client 135 has no access to metadata when submitting a query. Thus, metadata cannot be included with the metric of Shah.

Second, Shah fails to cure the deficiencies of Shah. The processing referred to by Examiner ("somehow the data and tables are measuring in response to the query") is not guided by metadata in the metric request, but by the analytic server 120 itself on its own accord. To this end, Shah states that "[t]he client need not have knowledge of how the metric is calculated" (Shah 2:54-55), so Shah is not providing additional information to help figure out the metric as stated by Examiner. Instead, an API 140 located on the sever side allows clients to request metrics. The analytic server 120 then determines how to access the database based on metadata retrieved by the analytic server 120 (Shah 3:4-6), not client 135. Thus, the metric of Shah clearly fails to disclose the query as recited by claim 49 in cooperation with the other limitations.

Therefore, claim 49, and all related claims, are patentable over Draaijer and Shah for at least these reasons.

CONCLUSION

Applicant's attorney believes this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

June 23, 2008

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